

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

**IN RE:**

**Pro-Mark Services, Inc.,  
  
Debtor.**

**Case No. 24-30167**

**Chapter 7**

**Chief Judge Shon Hastings**

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**Erik A. Ahlgren, Trustee, et al.,  
  
Plaintiff,**

**-v-**

**Connie Berg, et al.,  
  
Defendants.**

**Adv. Case No. 24-07014**

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**NOTICE OF MOTION AND MOTION TO DISMISS BY MIGUEL PAREDES**

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NOTICE IS HEREBY GIVEN that Defendant Miguel Paredes, has filed a Motion to Dismiss, a copy of which is herewith served upon you. If no objections thereto are filed on or before twenty-one (21) days after the date hereof, the Court will enter an Order granting the relief requested in the motion.

YOU ARE FURTHER NOTIFIED that if objections to the relief requested in the motion are timely filed, the Court will schedule a hearing on the motion and objections in accordance with the provisions in Local Rule 7007-1 of the North Dakota Rules of Bankruptcy Procedure.

YOU ARE ALSO NOTIFIED that written objections to said motion, if any, shall be filed with the Clerk of the United States Bankruptcy Court, whose address is 655 First Avenue North,

Suite 210, Fargo, ND 58102, with a copy mailed to counsel for Defendant Miguel Paredes, whose name and address is listed below.

Pursuant to Federal Rule of Civil Procedure 12(b)(6) and Federal Rule of Bankruptcy Procedure 7012(b), Defendant Miguel Paredes (“Paredes”) moves to dismiss the only claims (Count 21) asserted against him in the Amended Complaint (Doc. 11.) The grounds for this motion are set forth in the attached Memorandum in Support. Pursuant to Bank. R. 7012(b), Paredes consents to the entry of final orders or judgment by the bankruptcy court.

Dated: October 25, 2024

Respectfully submitted,

/s/ Michael L. Scheier

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**CERTIFICATE OF SERVICE**

I certify that on October 25, 2024, I electronically filed the foregoing Motion to Dismiss and Memorandum of Law in Support of Motion to Dismiss by Defendant Miguel Paredes with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record:

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